

LAW OFFICES OF
JOSHUA L. DRATEL, P.C.
A PROFESSIONAL CORPORATION

29 BROADWAY
Suite 1412
NEW YORK, NEW YORK 10006

TELEPHONE (212) 732-0707
FACSIMILE (212) 571-3792
E-MAIL: JDratel@JoshuaDratel.com

JOSHUA L. DRATEL

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LINDSAY A. LEWIS
WHITNEY G. SCHLIMBACH

STEVEN WRIGHT
Office Manager

June 12, 2015

BY ECF

The Honorable John Gleeson
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Hasbajrami,
11 Cr. 623 (JG)

Dear Judge Gleeson:

This letter is in regard to the above-entitled case, in which I, along with Steven Zissou, Esq., and Michael Bachrach, Esq., represent defendant Agon Hasbajrami, and relates to the defense's motion, pursuant to *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 526 U.S. 59 (1993), to preclude the testimony of the government's proposed expert, Evan Kohlmann.

The government provided Mr. Kohlmann's expert report today. It is respectfully requested that the *Daubert* motion be due Monday, June 22, 2015, in part because preparation of the motion will involve some work in the Secure Compartmentalized Information Facility, and in part because Mr. Bachrach will be unavailable during part of next week due to travel related to an authorized federal capital prosecution in which he represents the defendant.

Respectfully Submitted,



Joshua L. Dratel

JLD/

cc: Seth D. DuCharme
Saritha Komatireddy
Assistant United States Attorneys